

-Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
Amendment of Parts 2 and 25 of the)	RM- 11839
Commission's Rules to Enable Primary)	
Fixed-Satellite Service (Space-to-Earth))	
Operations in the 17.3-17.7 GHz Band)	

COMMENTS OF TELESAT CANADA

Telesat Canada ("Telesat") hereby submits these comments in support of the Petition for Rulemaking (the "Petition") of SES Americom, Inc. ("SES") in the above-captioned proceeding. In its Petition, SES asks that the Commission propose rule changes that would authorize 17.3-17.7 GHz ("17 GHz band") fixed-satellite service ("FSS") operations in the space-to-Earth direction on a primary basis.¹ Telesat supports SES's request.

Telesat is one of the largest and most successful satellite operators in the world and a leading provider of voice, data, video and IP networking services to the private sector and governments. The company's advanced communications are delivered through its global fleet of geostationary satellite orbit ("GSO") satellites, a number of which include payloads with Ka-band capacity. Telesat is also developing a large Ka-band NGSO low earth orbit ("LEO") constellation comprised of advanced satellites that will deliver high capacity, high speed, low latency data services worldwide.

¹ *In re Amendment of Parts 2 and 25 of the Commission's Rules to Enable Primary Fixed-Satellite Service (Space-to-Earth) Operations in the 17.3-17.7 GHz Band*, Petition for Rulemaking of SES Americom, Inc., RM-11839, filed Mar 5, 2019 ("Petition") at 1.

Telesat shares the concerns expressed by SES regarding the limited availability of FSS frequencies that can be used to operate gateway earth stations to support the burgeoning development of Ka-band satellite services.² The 17 GHz band is well-suited to supplement the frequency capacity available for this purpose, both in terms of its functionality for FSS operators in the Ka-band, including Telesat and SES, and the compatibility of their use with other authorized uses of the band.

As demonstrated by SES, FSS operators will be able to use the 17 GHz band following the same framework relative to the location and operation of earth stations that the Commission recently adopted to permit BSS operations in the band.³ In a world of increasingly limited spectrum, providing for the expanded use of the 17 GHz band to support growing demand for FSS Ka-band downlink spectrum while not jeopardizing existing operations in the band will enhance the use of spectrum for the public good.

Telesat agrees with SES that the absence of an international allocation for FSS downlinks in the 17 GHz Band is not an obstacle to the rule revisions requested in the Petition, as their effect would be limited to space stations serving the U.S. and earth stations located in the U.S.⁴ These operations fall squarely within the FCC's jurisdiction.

² *Petition* at 3-4.

³ *Id.* at 4-7.

⁴ *Id.* at 11.

Telesat wishes also to draw the Commission's attention to the fact that Innovation, Science, and Economic Development Canada ("ISED") has under consideration similar changes to the Canadian Table of Frequency Allocations governing the 17 GHz Band.⁵ Telesat has supported these changes in reply comments filed with ISED.⁶ The changes also are supported by the organization that represents most sectors of the radio-communication business in Canada.⁷

The fact that Canada is considering changes similar to those proposed by SES for the United States is reflective of the broader development of satellite technology that knows no borders. It would be beneficial to have a common approach. For that reason,

⁵ *Consultation on the Utilization of the Bands 18.8-19.3 GHz and 28.6-29.1 GHz, and the Bands 17.3-17.7 GHz, 19.3-19.7 GHz and 29.1-29.25 GHz by the Fixed-Satellite Service*, Innovation, Science and Economic Development Canada, SMSE-016-18, rel. Oct 2018 at pp 14-20.

⁶ *Consultation on the Utilization of the Bands 18.8-19.3 GHz and 28.6-29.1 GHz, and the Bands 17.3-17.7 GHz, 19.3-19.7 GHz and 29.1-29.25 GHz by the Fixed-Satellite Service*, SMSE-016-18, Reply Comments of Telesat Canada, filed Feb 21, 2019 at p. 6.

⁷ *Consultation on the Utilization of the Bands 18.8-19.3 GHz and 28.6-29.1 GHz, and the Bands 17.3-17.7 GHz, 19.3-19.7 GHz and 29.1-29.25 GHz by the Fixed-Satellite Service*, SMSE-016-18, Comments of the Radio Advisory Board of Canada, filed Jan. 21, 2019 at pp. 5-6.

and for the reasons stated above and in the Petition, the Commission should implement SES's proposal for a rulemaking.

Respectfully submitted,

TELESAT CANADA

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CERTIFICATE OF SERVICE

I hereby certify that on this 31st day of May, 2019, a copy of the foregoing
Comments of Telesat Canada was sent by first-class United States mail to the following:

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